

REMARKS

In response to the Office Action dated August 28, 2006, Applicant respectfully requests reconsideration and withdrawal of the rejections of the claims. The allowance of claim 19, and the indication that claims 4 and 5 contain allowable subject matter, is noted with appreciation.

Claims 1-3, 7, 14 and 16-18 were rejected under 35 U.S.C. §102, on the basis of the newly-cited Lo patent (U.S. 5,657,111). The remaining claims were rejected under 35 U.S.C. §103, on the basis of the Lo patent in view of various secondary references. For the reasons presented below, it is respectfully submitted that the Lo patent neither anticipates, nor otherwise suggests, the subject matter of the rejected claims.

The Lo patent is directed to a system for printing three-dimensional photographs from a plurality of two-dimensional views. These three-dimensional photographs are printed on lenticular print material.

In rejecting claim 1, the Office Action asserts that the Lo patent inherently teaches at least one ink jet head, with reference to column 2, lines 5-31. It is respectfully submitted, however, that the Lo patent does not teach the use of an ink jet head to print the three-dimensional photographs. Rather, at column 1, lines 20-26, the patent discloses that the lenticular material, on which the photographs are printed, contains an underlying photosensitive emulsion. The patent further discloses that the photographic printer includes a chemical processor 130 having separate developer, bleach/fixing solution and stabilizer tanks, for processing the lenticular material after the photosensitive emulsion has been exposed to light

through an optical assembly 40. Thus, it will be appreciated that the Lo patent is directed to a photo chemical process, and not an ink jet printing process.

Claim 1 recites a computer-aided vision device having at least one video camera for dynamic discrimination between areas on a surface of a card medium in which printing is to be performed and areas in which printing is not to be performed. In connection with this claimed feature, the Office Action refers to the Lo patent at column 2, line 62 through column 3, line 3. This cited passage states that the printer uses "two video cameras with different magnifications *for viewing the negative*" (emphasis added). It is respectfully submitted that these video cameras are not the same as the computer aided vision device recited in claim 1. Specifically, the function of these cameras is to view the negative, i.e., the source image, from which the three-dimensional image is printed. In other words, these cameras generate the data for the three-dimensional image.

In contrast, claim 1 recites that the computer aided vision device discriminates between areas on the surface of the card medium, i.e., the target medium onto which the graphics are printed. It is respectfully submitted that the Lo patent does not disclose that either of the cameras 52 or 54 views an area on the lenticular print material 110. There is no disclosure in the Lo patent of a computer-aided vision device that detects features relating to the print medium, particularly areas on which printing is to be avoided.

In summary, therefore, the cameras of the Lo patent generate data for the *content* of the three-dimensional image that is created by a photo chemical process, whereas the computer-aided vision device of claim 1 examines the card medium to determine *where* the ink jet head is to print graphics. The cameras of the Lo patent

perform an entirely different function from the computer-aided vision device of claim 1, and therefore cannot be interpreted to anticipate the claimed subject matter.


Additional distinguishing features of the invention are recited in the dependent claims. In view of the fundamental differences between the subject matter of claim 1 and the photo chemical, three-dimensional printer of the Lo patent, described above, a detailed discussion of these additional distinctions is believed to be unnecessary at this time.

Reconsideration and withdrawal of the rejections, and allowance of all pending claims is respectfully requested.

Respectfully submitted,

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